

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

UNITED STATES OF AMERICA

vs.

SIMON WATSON,

DEFENDANT

:
:
:
:
:
:
:
:
:
:

CRIMINAL NO. 5:14-cr-42-CAR

VIOLATIONS:

18 U.S.C. 495

18 U.S.C. 1028(a)(7)

18 U.S.C. 641

18 U.S.C. 1028A

INDICTMENT

THE GRAND JURY CHARGES:

**COUNT ONE
UTTERING A FORGED INSTRUMENT
18 U.S.C 495**

On or about February 11, 2014, in Houston County, in the Middle District of Georgia, the defendant, SIMON WATSON, with intent to defraud the United States, did utter a forged writing, to wit, check # 1074 in the amount of \$275.30, drawn on the account of Warner Medical Management, dated February 2, 2014, payable to S.B., whose identity is known to the Grand Jury, knowing said check bore the forged endorsement of S.B. and did utter the forged check to the U.S. Army and Air Force Exchange Service (AAFES) at Robins Air Force Base; All in violation of Title 18, United States Code, Section 495.

**COUNTS TWO THROUGH ELEVEN
UTTERING A FORGED INSTRUMENT
18 U.S.C. 495**

On or about the dates listed below, within the Middle District of Georgia, Defendant SIMON WATSON, did with intent to defraud the United States, utter forged writings in the form of checks which are listed below, in the amounts listed below, knowing that the said checks bore the forged endorsements of the payees listed below, and uttered the forged checks to the U.S. Army and Air Force Exchange Service (AAFES) at Robins Air Force Base;

All in violation of Title 18, United States Code, Section 495.

| Count | Date Presented | Date of check | Amount of Check | Check Drawn on | Check # | Payee |
|--------------|-----------------------|----------------------|------------------------|---------------------------|----------------|--------------|
| Two | 2/13/14 | 2/9/14 | \$289.75 | Corvic Group | 1094 | S.B. |
| Three | 2/17/14 | 2/12/14 | \$457.55 | Corvic Group | 1118 | S.B. |
| Four | 2/18/14 | 2/10/14 | \$289.75 | Corvic Group | 1091 | S.B. |
| Five | 2/20/14 | 2/12/14 | \$287.05 | Warner Medical Management | 1091 | C.P. |
| Six | 2/20/14 | 2/15/14 | \$287.05 | Warner Medical Management | 1088 | C.P. |
| Seven | 2/22/14 | 2/18/14 | \$287.75 | Corvic Group | 1127 | C.P. |
| Eight | 2/24/14 | 2/12/14 | \$377.05 | Warner Medical Management | 1097 | C.P. |
| Nine | 2/28/14 | 2/27/14 | \$260.00 | Corvic Group | 1134 | S.C. |

| | | | | | | |
|--------|--------|---------|----------|---------------------------|------|------|
| Ten | 3/1/14 | 2/26/14 | \$277.05 | Warner Medical Management | 1082 | S.C. |
| Eleven | 3/2/14 | 2/26/14 | \$289.05 | Corvic Group | 1145 | S.C. |

**COUNT TWELVE
THEFT OF PUBLIC FUNDS
18 U.S.C. 641**

Beginning on or about February 11, 2014, through on or about March 2, 2014, in Houston County, and elsewhere in the Middle District of Georgia, the Defendant SIMON WATSON, knowingly and willfully, with intent to deprive the owner of the use or benefit of the money so taken, did, steal, purloin, and convert to his own use, money of the United States, that is, funds of the United States in an amount greater than \$1,000, by cashing forged checks and receiving money provided by the United States Army and Air Force Exchange Service, as more particularly described in Counts One through Eleven, as alleged herein, and which are made a part hereof by reference;

All in violation of Title 18, United States Code, Section 641.

**COUNT THIRTEEN
FRAUD IN CONNECTION WITH IDENTIFICATION DOCUMENTS AND
INFORMATION
18 U.S.C. § 1028(a)(7)**

Beginning on or about February 11, 2014, and continuing through February 18, 2014, in the Middle District of Georgia, Defendant SIMON WATSON

did knowingly possess and use in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, to wit, the U.S. Military Common Access Card of S.B., with the intent to commit and in connection with an unlawful activity that constitutes a violation of Federal law, uttering a forged instrument in violation of 18 U.S.C. 495 as alleged in Counts One through Four of this Indictment, and the Defendant obtained funds of the United States Government in an aggregate amount of more than \$1000; All in violation of Title 18, United States Code, Section 1028(a)(7).

**COUNT FOURTEEN
FRAUD IN CONNECTION WITH IDENTIFICATION DOCUMENTS AND
INFORMATION
18 U.S.C. § 1028(a)(7)**

Beginning on or about February 20, 2014, and continuing through February 24, 2014, in the Middle District of Georgia, Defendant SIMON WATSON did knowingly possess and use in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, to wit, the U.S. Military Common Access Card of C.P., with the intent to commit and in connection with an unlawful activity that constitutes a violation of Federal law, that is, uttering a forged instrument in violation of 18 U.S.C. 495 as alleged in Counts Five through Eight of this Indictment, and the Defendant obtained funds of the United States Government in an aggregate amount of more than \$1000;

All in violation of Title 18, United States Code, Section 1028(a)(7).

**COUNT FIFTEEN
FRAUD IN CONNECTION WITH IDENTIFICATION DOCUMENTS AND
INFORMATION
18 U.S.C. § 1028(a)(7)**

Beginning on or about February 28, 2014, and continuing through March 2, 2014, in the Middle District of Georgia, Defendant SIMON WATSON did knowingly possess and use in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, to wit, the U.S. Military Common Access Card of S.C., with the intent to commit and in connection with an unlawful activity that constitutes a violation of Federal law, that is, uttering a forged instrument in violation of 18 U.S.C. 495, as alleged in Counts Nine through Eleven of this Indictment;

All in violation of Title 18, United States Code, Section 1028(a)(7).

**COUNTS SIXTEEN THROUGH EIGHTEEN
AGGRAVATED IDENTITY THEFT
18 U.S.C. 1028A**

On or about the below listed dates, in the Middle District of Georgia, the Defendant, SIMON WATSON, did knowingly possess, use, and transfer without lawful authority, a means of identification, that is, the military Common Access Card of another person as described below, during and in relation to the offense of Theft of Public Funds, in violation of Title 18 United States Code, Section 641, as

alleged in Count Twelve, which are more particularly described above in Counts

One through Twelve:

| Count | Dates | Name of Other Person |
|-------|---------------------|----------------------|
| 16 | 2/11/14- 2/18/14 | S.B. |
| 17 | 2/20/14- 2/24/14 | C.P. |
| 18 | 2/28-14-3/2/14 | S.C. |

All in violation of Title 18 United States Code, Section 1028A.

A TRUE BILL.

S/FOREPERSON OF THE GRAND JURY

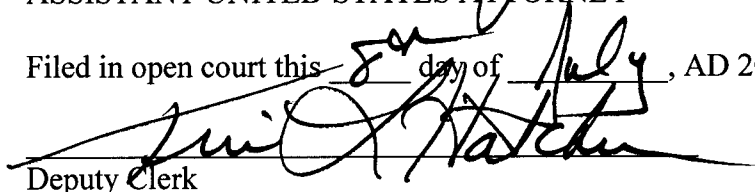
Presented by:

MICHAEL J. MOORE
UNITED STATES ATTORNEY



GRAHAM A. THORPE
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 8th day of July, AD 2014.



Deputy Clerk